### BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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Complaint on Sunday	
and Holiday Collections	;

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORIES OCA/USPS-1(a.-e.), 4-5, 8-9, AND 12 (June 18, 2001)

OCA interrogatories 1 - 14 were filed on May 22, 2001. The Postal Service requested an extension of time to object or respond, and an extension of time to file objections was granted until June 8, 2001, and to respond until June 12, 2001. On June 8, the Postal Service objected to parts a-e and i of question 1, and all of questions 3-10 and 12-13. On June 12, the Postal Service responded to OCA/USPS 1(f.-h.), 2, 11, and 14. After informal consultation with the OCA intended to narrow the scope of the questions to issues of holiday service, the Postal Service has, without necessarily waiving its relevance objection, agreed to provide the following answers to OCA/USPS-1(a.-e.), 4-5, 8-9, and 12, in exchange for the OCA agreeing to withdraw (i.e., not move to compel responses to) questions 1(i.), 3, 6-7, 10, and 13. Each question is stated verbatim, and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

Eric P. Koetting

**Attorney** 

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 June 18, 2001

- OCA/USPS-1. The following interrogatories refer to the mail pickup times listed on USPS mail collection boxes. Also, please refer to POM 8, section 313.1 and 313.2
- (a) Do sections 313.1 and 313.2 reflect the Postal Service's policy regarding mail pickup times? If not, please provide a copy of the publication that states the Postal Service's actual policy.
- (b) Section 313.1 indicates that collections be made "as near as possible to the posted pickup time, but not before posted times for specific trips."
  - (1) For each of the past five years, is the Postal Service aware of any mail being picked up prior to posted times? Please identify all documents examined in preparing this response.
  - (2) If your response to part '(b)(1)' of this interrogatory is affirmative, please indicate when and under what circumstances mail was picked up prior to the times posted on collection boxes?
- (c) For FY 2000, what volume of mail was picked up earlier than the posted collection times? For each instance of an early pickup time, please provide the volume of collection mail picked up on the following day.
- (d) POM 8 section 313.2 indicates that "motorized collections ... should be made no later than 20 minutes after the posted time." What is the Postal Service's current policy regarding mail pick-ups occurring after the time(s) posted on collection boxes? Please provide a copy of the publication that states the Postal Service's actual policy.
- (e) Please describe the impact upon further mail processing when collection mail is picked up later than the designated time posted on the box.

#### RESPONSE:

- a. Those sections, as well as other relevant sections of Chapter 3 of the POM, reflect current guidance regarding mail pickup times.
- b. With respect to the available information regarding advanced pickups on holiday eves, please see the response to DFC/USPS-13 and 14.
- c. The requested information does not exist.
- d. The cited section of the POM reflects the current guidance regarding the window after posted collection times within which collection should occur.
- e. The impact of any particular delay in collection on mail processing depends on specific circumstances. It is possible that the delayed mail could still arrive at the

processing unit in time for normal processing, in which case there would be no impact. It is possible that the delayed mail could cause the processing unit to have to extend its outgoing operations beyond the time that would otherwise be the case, but not beyond a time that prevents timely dispatch. Given a substantial enough delay in collection, it is also possible that the mail could fail to arrive at the processing unit in time to achieve timely dispatch.

OCA/USPS-4. The following interrogatory refers to the Postal Service's formula for calculating the percentage of mail delivered on time.

- (a) Please provide the current formula used to calculate the percentage of mail delivered on time. If the calculation used differs depending on the class or subclass of mail, please provide each formula used and identify the applicable mail class or subclass.
- (b) In determining the number of days it takes to deliver a mail piece, please provide the following information:
  - (1) Does the Postal Service include each and every day of a Julian calendar year when calculating the number of delivery days?
  - (2) If the response to part (b)(1) of this interrogatory is other than affirmative, please specifically identify each and every day that would not be included in the calculation of the number of days to deliver.

#### **RESPONSE:**

- a. The formulas are not necessarily a direct function of the class or subclass involved, but instead relate to particular reporting systems. For EXFC and PETE, see USPS-LR-I-326 (Docket R2000-1), page 9, and Appendix X, page 16. In ODIS, the percentage is calculated as 100 times the ratio of the portion of the estimated "Known Delivery Days" volume that meet delivery service requirements, to the total estimated "Known Delivery Days" volume. Since EMRS is a census, the percentage of pieces delivered on time is simply the percentage of pieces delivered on time.
  - b. 1. No.
- 2. For EXFC and PETE, see USPS-LR-I-326, Appendix IX. The adjustment for ODIS is essentially the same.

OCA/USPS-5 pickup times?

Who is responsible for establishing the USPS mail collection box

**RESPONSE:** 

Local officials, guided by POM Chapter 3.

OCA/USPS-8. Who is responsible for coordinating collection box pickups and then transporting that box mail to a mail processing facility?

### **RESPONSE:**

Local officials.

OCA/USPS-9. Describe all methods used to monitor the timeliness of USPS collections from collection boxes.

### **RESPONSE:**

The most common methods involve use of CBMS data, and direct observation by supervisors. The quarterly collection test method theoretically is available as well, although its use has largely been supplanted by the use of CBMS. Lastly, information available from EXFC may also highlight situations relating to the timeliness of collections.

OCA/USPS-12. Has the USPS conducted or does it know of any analysis performed that studies customers' perceptions of the type of service mail receives after it is deposited in a USPS street collection box? If so, please provide a copy of the analysis. If none has been performed, please explain why none has been conducted.

### **RESPONSE:**

The Postal Service is unaware of any analyses of the type described in this question. No need to conduct any such analysis has been identified.

### **CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

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